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FILED

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Clerk, U.S. District Court
District Of Montana
Great Falls

ATTORNEYS FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

UNITED STATES OF AMERICA,	CR 18- 82 -GF- Bmm
Plaintiff,	INDICTMENT
vs.	AGGRAVATED SEXUAL ABUSE
GENEVA MARIE NADEAU,	(Count I)
Defendant.	Title 18 U.S.C. §§ 1153(a) and 2241(c) (Penalty: Mandatory minimum 30 years to life imprisonment, \$250,000 fine, and five years to life supervised release)
	SEXUAL EXPLOITATION OF A CHILD (Counts II-III) Title 18 U.S.C. §§ 2251(a) and 2 (Penalty: Mandatory minimum 15 to 30 years imprisonment, \$250,000 fine, five years to life supervised release, and \$5,000 special assessment)

	TRANSPORTATION OF CHILD PORNOGRAPHY (Count IV) Title 18 U.S.C. §§ 2252(a)(1) and (b) (Penalty: Mandatory minimum five to 20 years imprisonment, \$250,000 fine, five years to life supervised release, and \$5,000 special assessment)
	POSSESSION OF CHILD PORNOGRAPHY (Count V) Title 18 U.S.C. § 2252A(a)(5)(A) and (B) (Penalty: 20 years imprisonment, 250,000 fine, five years to life supervised release, and \$5,000 special assessment)
	FORFEITURE 18 U.S.C. § 2253(a)

THE GRAND JURY CHARGES:

COUNT I

That on or about October 19, 2015, at Hays and within Blaine County, in the State and District of Montana, and within the exterior boundaries of the Fort Belknap Indian Reservation, being Indian Country, the defendant, GENEVA MARIE NADEAU, an Indian person, knowingly engaged in a sexual act with “Jane Doe,” and at the time of the sexual act, “Jane Doe” had not yet reached 12 years of age, in violation of 18 U.S.C. §§ 1153(a) and 2241(c).

COUNT II

That on or about September 12, 2015, at Hays and within Blaine County, in the State and District of Montana, and elsewhere, the defendant, GENEVA MARIE NADEAU, did employ, use, persuade, induce, entice, and coerce, and attempt to employ, use, persuade, induce, entice, and coerce, any minor, “Jane Doe,” to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction has actually been transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and did aid and abet the same, in violation of 18 U.S.C. §§ 2251(a) and 2.

COUNT III

That on or about October 19, 2015, at Hays and within Blaine County, in the State and District of Montana, and elsewhere, the defendant, GENEVA MARIE NADEAU, did employ, use, persuade, induce, entice, and coerce, and attempt to employ, use, persuade, induce, entice, and coerce, any minor, “Jane Doe,” to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means,

including by computer, and such visual depiction has actually been transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and did aid and abet the same, in violation of 18 U.S.C. §§ 2251(a) and 2.

COUNT IV

That between on or about March 5, 2018, and March 9, 2018, at Hayes and within Blaine County, in the State and District of Montana, and elsewhere, the defendant, GENEVA MARIE NADEAU, knowingly transported any visual depiction using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, by any means, including by computer, namely a file on her Samsung model SM-T310 Galaxy Tablet – SN RF2DB2EA3AD and Samsung 16 GB micro SD card (installed), to Google Photos, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(1) and (b).

COUNT V

That from on or about May 2015, through in or about April of 2018, at Hays and within Blaine County, in the State and District of Montana, and elsewhere, the defendant, GENEVA MARIE NADEAU, within the exterior boundaries of the Fort Belknap Indian Reservation, being Indian Country, knowingly possessed

material containing an image of child pornography, and which was produced using materials that have been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, namely images on the SanDisk 4 GB micro SD card, Samsung 16 GB micro SD card, SanDisk 32 GB micro SD card, LG cellular telephone IMEI – SN 358402087062937, in violation of 18 U.S.C. § 2252A(a)(5)(A) and (B).

The images of child pornography involved a prepubescent minor and a minor who had not attained the age of 12 years.

FORFEITURE ALLEGATION


As a result of the commission of the crimes described above, and upon conviction of any of those crimes, the defendant, GENEVA MARIE NADEAU, pursuant to 18 U.S.C. § 2253(a), shall forfeit to the United States any property, real and personal, used and intended to be used to commit and to promote the commission of such offenses and any property traceable to such property, including:

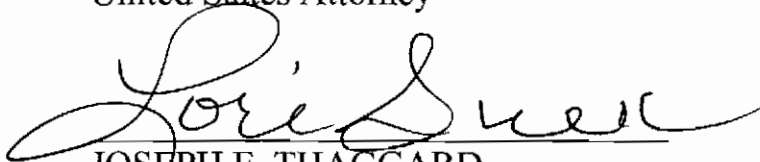
- Samsung model SM-T310 Galaxy Tablet – SN RF2DB2EA3AD;
- SanDisk 4 GB micro SD card;
- Samsung 16 GB micro SD card (installed);
- Samsung 16 GB micro SD card;
- SanDisk 32 GB micro SD card; and,

- LG cellular telephone IMEI – SN 358402087062937.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

for 
KURT G. ALME
United States Attorney


JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney

Crim. Summons _____

Warrant, _____

Bail, _____

In fed custody

Arraignment set

10/9/18 @ 2pm

GF Judge Johnston